

**Freedom Court Reporting, Inc**

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF TEXAS  
3 MARSHALL DIVISION  
4 Case No. 2:08-cv-422 TJW  
5  
6 -----

7 DEPOSITION OF BETHANY J. MAYNARD  
8 July 16, 2010  
9 -----

10 PATTY BEALL, MATTHEW MAXWELL, TALINA McELHANY and  
11 KELLY HAMPTON, individually and on behalf of all others  
12 similarly situated,

13 Plaintiffs,

14 vs.

15 TYLER TECHNOLOGIES, INC., and EDP ENTERPRISES, INC.,  
16 Defendants.  
17 -----

18 APPEARANCES:

19 ZELBST, HOLMES & BUTLER, by  
20 Ms. Chandra L. Holmes Ray  
21 P.O. Box 365  
22 411 Southwest Sixth Street  
23 Lawton, Oklahoma 73502  
24 Appeared on behalf of the Plaintiffs.

25 MORGAN, LEWIS & BOCKIUS, LLP, by  
Mr. Paulo B. McKeeby  
1717 Main Street, Suite 3200  
Dallas, Texas 75201  
Appeared on behalf of the Defendants.

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1 ask you a specific question. What would it depend  
2 on as to whether or not -- what different types of  
3 training would you provide that would differ  
4 depending on whether or not a conversion had  
5 already taken place?

6 A If I'm there to set up user security, that's  
7 happening very early on and is not -- doesn't require  
8 data to be in the system.

9 Q Okay.

10 A However, if you're doing general ledger training,  
11 there may need to be the chart of accounts converted  
12 into the system.

13 Q User security training, that would simply be  
14 training as to maintaining the passwords and other  
15 security devices associated with the software?

16 A And permissions.

17 Q But the data from the company's -- the client's old  
18 system need not be converted at that point?

19 A No.

20 Q That's a true statement?

21 A Yes.

22 Q Do I understand correctly that Munis while you were  
23 employed with Tyler had a separate department that  
24 did the actual conversion of the information?

25 A Yes.

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36

1 Q You didn't convert the information as an  
2 implementation specialist at Munis?

3 A No.

4 Q What was that? Was it called the conversion  
5 department?

6 A I can't remember what they were called.

7 Q But it was a particular department?

8 A It wasn't me. I don't know. I don't know.

9 Q That's fine. Okay. Not employees that you would  
10 have interacted with on a regular basis?

11 A Define on a regular basis. I mean during -- during a  
12 conversion?

13 Q Yeah.

14 A Yes.

15 Q On what -- What was the context of the interaction?  
16 What would you guys -- would you be -- would they  
17 have questions for you?

18 A On the phone. I would be asking them why data didn't  
19 come in, wasn't there, was missing, was wrong.

20 Q And that would be something that you would have  
21 detected during the course of your training?

22 A Yes.

23 Q And when you're doing the actual training, I take  
24 it -- let's put security training to one side, but  
25 when you're doing the general ledger training or

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41

1 Q And in the context of requisition software, levels  
2 of approval means what particular individuals have  
3 approval rights as to particular purchases?

4 A Correct.

5 Q And obviously you need to know that from the  
6 customer to be able to train the users?

7 A Yes.

8 Q Are you familiar with the term systems analysis?

9 A Yes.

10 Q I'm sorry. There's a different term that I'm going  
11 to ask you about. Something called analysis  
12 sessions?

13 A Yes.

14 Q Does an analysis session as it was used at Tyler  
15 Munis refer to this initial type of training that  
16 you just testified to concerning in this example  
17 the approval chain with respect to requisition  
18 software?

19 A What analysis session means to me is that each client  
20 is different but the software remains the same, so  
21 it's determining how the client's going to use the  
22 software of the prescribed ways you can use it.

23 Q Is an analysis session something that you performed  
24 as an implementation specialist?

25 A I conducted training sessions where we decided which

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1           STATE OF WISCONSIN                 )  
  ) SS.  
2           MILWAUKEE COUNTY                 )

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I, BETHANY J. MAYNARD, do hereby

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certify that I have read the foregoing transcript of

6

proceedings, taken on the 16th day of July, 2010, at

7

710 North Plankinton Avenue, Milwaukee, Wisconsin,

8

and the same is true and correct except for the list

9

of corrections, if any, noted on the annexed errata

10

sheet.

11

Dated at \_\_\_\_\_,

12

\_\_\_\_\_, this \_\_\_\_\_ day of \_\_\_\_\_

13

\_\_\_\_\_, 2010.

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BETHANY J. MAYNARD

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139

1 CERTIFICATE OF NOTARY

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3 STATE OF MICHIGAN )

4 ) SS

5 COUNTY OF WAYNE )

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7 I, Jacquelyn S. Fleck, Certified Shorthand

8 Reporter, a Notary Public in and for the above county

9 and state, do hereby certify that the above deposition

10 was taken before me at the time and place hereinbefore

11 set forth; that the witness was by me first duly sworn

12 to testify to the truth, and nothing but the truth,

13 that the foregoing questions asked and answers made by

14 the witness were duly recorded by me stenographically

15 and reduced to computer transcription; that this is a

16 true, full and correct transcript of my stenographic

17 notes so taken; and that I am not related to, nor of

18 counsel to either party nor interested in the event of

19 this cause.

20

21

22 \_\_\_\_\_  
Jacquelyn S. Fleck, CSR-1352, RPR, RMR, CRR

23 Notary Public,

24 Wayne County, Michigan

25 My Commission expires: 08-16-2012